

MAYSOUN FLETCHER  
The Fletcher Firm, P.C.  
Nevada State Bar No. 10041  
5510 S. Fort Apache Road  
Las Vegas, Nevada 89148  
(702) 835-1542/Phone  
(702) 835-1559/Fax  
[maf@fletcherfirmlaw.com](mailto:maf@fletcherfirmlaw.com)  
Attorney for RYAN C. BUNDY

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA**

**UNITED STATES OF AMERICA,**

| Case No. 2:16-cr-00046-GMN-PAL

**Plaintiff,**

v.

RYAN C. BUNDY

Defendant.

**MOTION FOR FURTHER HEARING  
AS TO RYAN BUNDY RELATED TO  
SELF-REPRESENTATION/WAIVER  
OF RIGHT TO COUNSEL**

**Certification:** This motion is timely filed.

COMES NOW the defendant, RYAN C. BUNDY (hereinafter "MR. BUNDY"), by and through his appointed counsel, Maysoun Fletcher, Esq, and hereby requests that he be allowed to represent himself in the matter following a Faretta canvass, with instant counsel being appointed as standby counsel, if neccessary.

This motion is brought before the Court pursuant to Local Rule 1A 10-6, Rule 44(a) of the Federal Rules of Criminal Procedure, the Pleadings and Papers currently on file in the case, as well as any further representations of counsel as the Court may request.

Dated this 17th day of October, 2017.

Respectfully submitted,

/s/ Maysoun A. Fletcher, Esq.  
MAYSOUN A. FLETCHER, ESQ.  
5510 S. Fort Apache Rd.  
Las Vegas, NV 89148  
Attorney for Defendant,  
RYAN C. BUNDY

## **MEMORANDUM**

On April 15, 2016, Angela A. Dows, Esq. filed an original motion for a Faretta hearing as to MR. BUNDY. (See Doc. No 244). After a motion hearing on April 19, 2016, MR. BUNDY was granted the right to represent himself as guaranteed by the Sixth Amendment, with Angela A. Dows, Esq. serving as standby counsel. (See Doc. No. 285).

On August 30, 2017, Angela A. Dows, Esq. filed a motion for further hearing as to MR. BUNDY related to self-representation/waiver of right to counsel with regards to issues that arose regarding Angela A. Dows' relative role. (See Doc. No. 2325). After a motion hearing on September 8, 2017, the Court directed that Miss Dows will remain as standby counsel and clarified her position. (See Doc. No. 2346).

On September 13, 2017, Angela A. Dows, Esq. filed a Motion to withdraw as standby counsel. (See Doc. No. 2389). After a status conference on October 6, 2017, Ms. Dows' Motion to Withdraw was granted and MR. BUNDY was stripped of his right to represent himself and forced to accept an attorney as his representative. Mr. Thomas A. Ericsson was appointed as MR. BUNDY'S counsel of record, however Mr. Ericsson requested that he be relieved as counsel of record and replaced by another attorney. (See Doc. No. 2631).

On October 11, 2017, the Court appointed Maysoun A. Fletcher, Esq. in the place of Thomas A. Ericsson, as counsel for MR. BUNDY for all future proceedings. (See Doc. No. 2660).

On October 13, 2017, Mrs. Fletcher met with MR. BUNDY at the Nevada Southern Detention Center. He unequivocally expressed his demand to represent himself, as guaranteed by the Sixth Amendment, with instant counsel serving as standby counsel, if necessary.

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Therefore, counsel hereby requests that MR. BUNDY be canvassed, pursuant to *Farella v. California*, 422 U.S. 806 (1975). Counsel asks that this matter be addressed on or before October 19, 2017, the deadline for Exhibit Lists, Proposed Voir Dire, Proposed Jury Instructions, and Trial Briefs.

Dated this 17th day of October 2017.

Respectfully submitted,

/s/ Maysoun A. Fletcher, Esq.  
MAYSOUN A. FLETCHER, ESQ.  
5510 S. Fort Apache Rd.  
Las Vegas, NV 89148  
Attorney for Defendant,  
RYAN C. BUNDY

1                   **CERTIFICATE OF ELECTRONIC SERVICE**

2                   The undersigned hereby certifies that she is an employee of the The Fletcher Firm,  
3 P.C. and is a person of such age and discretion as to be competent to serve papers.

4                   That on October 19, 2017, she served an electronic copy of the above and foregoing

5                   **MOTION FOR FURTHER HEARING AS TO RYAN BUNDY RELATED TO SELF-**  
6                   **REPRESENTATION/WAIVER OF RIGHT TO COUNSEL** by electronic service (ECF)  
7 to all counsel of record.

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9                   */s/ Maysoun Fletcher*  
10                  Employee of the Fletcher Firm, P.C.  
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